

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

MYNECA Y. OJO and KAREN ANN CROSBY,	:	
	:	
Plaintiffs	:	
vs.	:	1: 20-CV- 0 0 0 6 6 1 - S H R
	:	
BREW VINO LLC, d/b/a GRANDVIEW GOLF COURSE, STEVE CHRONISTER, MARC BOWER, JORDAN LYLE CHRONISTER, and BRIAN POLACHEK,	:	
	:	
Defendants	:	

INITIAL DISCLOSURES OF PLAINTIFFS
MYNECA Y. OJO AND KAREN ANN CROSBY,
PURSUANT TO FED.R.CIV.P., RULE 26(a)(1)

I. Introduction

Plaintiffs, Myneca Y. Ojo and Karen Ann Crosby, by and through their attorneys, John L. Rollins, Esquire, of the LAW OFFICES OF JOHN L. ROLLINS, and Mary H. Powell, Esquire, of POWELL LAW PC, pursuant to Fed. R. Civ. P., Rule 26(a)(1) (Rule 26”), submit their Initial Disclosures in the above captioned federal civil rights cause of action with state claims, as follows:

II. Individuals likely to have discoverable information:

- 1.) Plaintiff Myneca Y. Ojo
- 2.) Plaintiff Karen Ann Crosby
- 3.) Sandra Thompson
351 E. Princess Street
York, PA 17403
Tel (717) 577-4436

- 4.) Sandra Harrison
3058 Gemstone Lane
York, PA 17404
Tel (240) 888-6754
- 5.) Carolyn Dow
60 Willow Wood Court
York, PA 17406
(717) 309-1563
- 6.) Jordan Lyle Chronister, Brew Vino, LLC, d/b/a Grandview Golf Course
2779 Carlisle Road
York, PA 17408
Tel (717) 309-8945
- 7.) Jordan Lyle Chronister
505 Sandstone Lane
York, PA 17404
Tel (717) 309-8945
- 8.) Steve Chronister
2779 Carlisle Road
York, PA 17408
Tel (717) 578-3880
- 9.) Marc Bower
2566 Locust Road
Dover, PA 17315
Tel (717) 683-7006
- 10.) Brian Polachek
1016 East Main Street
Annville, PA 17003
Tel (570) 687-8227
- 11.) Jerry Higgins
1876 Deerfield Drive
Dover, PA 17355
Tel (410) 736-2361
- 12.) Officer Erika L. Eiker,
Northern York County Regional Police
Municipal Office, 1445 East Canal Road
Dover, PA 17315-2798
(717) 292-3647

- 13.) Corporal Cody Becker
Northern York County Regional Police
Municipal Office, 1445 East Canal Road
Dover, PA 17315-2798
Tel (717) 292-3647
- 14.) All Individuals contained within Defendants' Initial Disclosures Statement.
- 15.) All other individuals identified in the course of discovery relating to the subject case.

Plaintiffs reserve the right to supplement and/or amend this Rule 26(a)(1) disclosure statement.

III. Description of documents in plaintiffs' possession, custody, or control that may be used to support their claims:

- 1.) Copies of Northern York County Regional Police's Incident Reports relating to the subject case:

Northern York County Regional Police
Municipal Office, 1445 East Canal Road
Dover, PA 17315-2798
(717) 292-3647
- 2.) Copies of Pennsylvania Human Relations Commission's Finding of Probable Cause and related documents regarding Plaintiff Myneca Y. Ojo:

Pennsylvania Human Relations Commission
Harrisburg Regional Office
333 Market Street, 8th Floor
Harrisburg PA 17101-2210
Tel (717) 787-4410
- 3.) Copies of Pennsylvania Human Relations Commission's Finding of Probable Cause and related documents regarding Plaintiff Karen Ann Crosby:

Pennsylvania Human Relations Commission
Harrisburg Regional Office
333 Market Street, 8th Floor
Harrisburg PA 17101-2210
Tel (717) 787-4410

- 4.) Copies of Imago Life Counseling's office records/documents regarding Plaintiff Myneca Y. Ojo:

Imago Life Counseling
160 South Progress Avenue, Suite 3A
Harrisburg, PA 17109
Tel (717) 306-9211

- 5.) Copies of Imago Life Counseling's office records/documents regarding Plaintiff Karen Ann Crosby:

Imago Life Counseling
160 South Progress Avenue, Suite 3A
Harrisburg, PA 17109
Tel (717) 306-9211

IV. Computation of Plaintiffs' damages:

Unknown pending discovery.

V. Identity of Plaintiffs' expert witness(es):

Plaintiffs have not yet made a determination as to the retention of expert witnesses. Plaintiffs will supplement this response consistent with the court's Case Management Order and the Federal Rules of Civil Procedure.

Respectfully submitted,

LAW OFFICES OF JOHN L. ROLLINS

By: /s/ **John L. Rollins**

John L. Rollins, Esq.

POWELL LAW PC

By: /s/ **Mary H Powell**

Mary H. Powell, Esq.

Dated: October 05, 2021

Attorneys for Plaintiffs

LAW OFFICES OF JOHN L. ROLLINS

John L. Rollins, Esquire (Pa. I.D. No. 65636)
1408 Burke Road
West Chester, PA 19380
Tel: (215) 512-4219 / Fax: (484) 879-6770
johnrollinsesq@gmail.com

Attorneys for Plaintiffs

POWELL LAW PC

Mary H Powell, Esquire (Pa. I.D. No. 87862)
2608 N 3rd St / P O Box 61485
Harrisburg, PA 17106-1485
Tel: (717) 230-8833 / Fax: (717) 230-8855
mpowell@powelllawpc.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDLE DISTRICT OF PENNSYLVANIA**

MYNECA Y. OJO and
KAREN ANN CROSBY,
Plaintiffs

vs.

1: 20-CV-000661 - S H R

BREW VINO LLC, d/b/a GRANDVIEW
GOLF COURSE,
STEVE CHRONISTER,
MARC BOWER,
JORDAN LYLE CHRONISTER, and
BRIAN POLACHEK,
Defendants

**CERTIFICATION OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE
UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA**

I, John L. Rollins, Esquire, counsel for Plaintiffs, Myneca Y. Ojo and Karen Ann Crosby, hereby certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania and the Federal Electronic Case Filing System that require filing confidential information and documents differently than nonconfidential information and documents.

/s/ John L. Rollins

Law Offices of John L. Rollins

Counsel for Plaintiffs

Date: October 05, 2021

LAW OFFICES OF JOHN L. ROLLINS

John L. Rollins, Esquire (Pa. I.D. No. 65636)
1408 Burke Road
West Chester, PA 19380
Tel: (215) 512-4219 / Fax: (484) 879-6770
johnrollinsesq@gmail.com

Attorneys for Plaintiffs

POWELL LAW PC

Mary H Powell, Esquire (Pa. I.D. No. 87862)
2608 N 3rd St / P O Box 61485
Harrisburg, PA 17106-1485
Tel: (717) 230-8833 / Fax: (717) 230-8855
mpowell@powelllawpc.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

MYNECA Y. OJO and	:	
KAREN ANN CROSBY,	:	
	:	
Plaintiffs	:	
vs.	:	1: 20-CV-000661-SHR
	:	
BREW VINO LLC, d/b/a GRANDVIEW	:	
GOLF COURSE,	:	
STEVE CHRONISTER,	:	
MARC BOWER,	:	
JORDAN LYLE CHRONISTER, and	:	
BRIAN POLACHEK,	:	
Defendants	:	
	:	

CERTIFICATE OF SERVICE

I, John L. Rollins, Esquire, counsel for Plaintiffs, Myneca Y. Ojo and Karen Ann Crosby, hereby certify that I have on the 5th day of October 2021, electronically filed the foregoing Fed. R. Civ P. Rule 26's initial disclosures of plaintiffs' Myneca y. Ojo and Karen Ann Crosby with the Clerk of Court via the CM/ECF system and emailed a courtesy copy to Kathryn Nonas-Hunter, Esquire of Ream, Carr, Markey, Woloshin, & Hunter, LLP, counsel for Defendants.

/s/ John L. Rollins
Law Offices of John L. Rollins
Counsel for Plaintiffs

Date: October 05, 2021